

Application Type Renewal
Facility Type Phase I MS4
Permit Type Individual

**NPDES PERMIT FACT SHEET
MS4s**

Application No. PA0054712
APS ID 717216
Authorization ID 829790

Applicant and Facility Information

Applicant Name	<u>City of Philadelphia</u>	Facility Name	<u>Philadelphia MS4</u>
Applicant Address	<u>The Aramark Tower 4th Floor</u> <u>1101 Market Street</u> <u>Philadelphia, PA 19107-2994</u>	Facility Address	<u>The Aramark Tower 4th Floor</u> <u>1101 Market Street</u> <u>Philadelphia, PA 19107-2994</u>
Applicant Contact	<u>David Katz</u>	Facility Contact	<u>David Katz</u>
Applicant Phone	<u>(215) 685-6118</u>	Facility Phone	<u>(215) 685-6118</u>
Client ID	<u>257214</u>	Site ID	<u>457092</u>
SIC Code	<u>9199</u>	Municipality	<u>Philadelphia City</u>
SIC Description	<u>Public Admin. - General Government, Nec</u>	County	<u>Philadelphia</u>
Date Application Received	<u>March 29, 2010</u>		
Date Application Accepted	<u>April 6, 2010</u>		
Purpose of Application	<u>Phase I MS4 permit application renewal.</u>		

Internal Review and Recommendations

The Philadelphia Water Department (PWD) requests the renewal of a Phase I Municipal Separate Storm Sewer System (MS4) for the City of Philadelphia (The City). The permit is being requested for the discharge stormwater from the City's MS4. The City's MS4 system consists of 639 outfalls, 434 City owned and 205 non-City owned outfalls discharging to Watersheds: 3G, 3F, 3J, and 2F. The MS4 system consists of a total of 1,538.27 miles of pipe throughout the City of Philadelphia. The City discharges to East Branch Indian Creek, West Branch Indian Creek, Indian Creek, Darby Creek, Cresheim Creek, Byberry Creek, Mill Run, Black Lake Run, Walton Run, Wooden Bridge Run, Schuylkill River, Delaware River, Cobbs Creek, Wissahickon Creek, Tacony-Frankford Creek, Pennypack Creek, Poquessing Creek, and their tributaries, and are classified Warm Water Fishes, Trout Stock Fishes, and Migratory Fishes (WWF, TSF, & MF). The City estimated population for July 1, 2016 is 1,567,872 per United States Census Bureau website.

Federal regulations issued in the year 1990 established a permit requirement within the National Pollutant Discharge Elimination System (NPDES) for discharges to surface waters from medium and large cities or certain counties with population of 100,000 or more. NPDES permits for discharges of stormwater from large and medium municipal separate storm sewer systems as defined 40 CFR § 122.26 (b)(3), are required under stormwater federal regulations (40 CFR Part 122) and state regulations incorporating those federal requirements by reference (25 Pa. Code § 92a.3).

On September 29, 1995, the Pennsylvania Department of Environmental Protection (DEP) Southeast Regional Office (SERO) issued the City's Stormwater Phase I NPDES permit for the control and management of stormwater discharges originating from MS4 outfalls. Amendment No. 1 to the City's MS4 permit was issued on April 20, 2006. The City submitted renewal permit application on March 29, 2010 and a revised Draft MS4 permit on December 24, 2012.

The City Phase I MS4 permit is one of two phase I permits in the Commonwealth of Pennsylvania, the review of this permit consisted of reviewing and updating the City's Phase I MS4 permit so that it is applicable to the City in this present time, taking into account things that the City has done during the first permit cycle and making changes to the permit that better

Approve	Deny	Signatures	Date
X		Juan J. Vicenty-Gonzalez / Environmental Engineering Specialist /S/	July 10, 2017
X		Pravin C. Patel, P.E. / Environmental Engineer Manager /S/	7/11/2017

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apply to the city in the present and for the future.

Stormwater generated runoff is typical of a 39.56 square miles of drainage area per 2016 Annual Report. Oils, grit, nutrients, and sediment are primary pollutants expected to be conveyed through the system. Accelerated flow of stormwater and its related erosive effects are also a pollutant of concern.

This permit establishes effluent limitations in the form of implementation of a Stormwater Management Program (SWMP) to reduce the discharge of pollutants from the MS4 to the maximum extent practicable (MEP). MEP means a technology-based discharge standard established in the CWA at § 402(p)(3)(B)(iii) that requires NPDES MS4 permittees to optimize reductions in stormwater pollutants on a location-by-location basis by minimizing pollutant loads in stormwater discharges and maximizing technically achievable and cost-effective water quality improvements, to protect water quality and quantity, and to satisfy the appropriate water quality requirements of the Federal Clean Water Act (Federal Water Pollution Control Act, as amended, 33 U.S.C.A. §§ 1251 – 1387), the Pennsylvania Clean Streams Law, and regulations promulgated thereto. The Federal Clean Water Act (CWA) provides that National Pollutant Discharge Elimination System (NPDES) permits for MS4s must require municipalities to reduce pollutants in their stormwater discharges to the MEP. All discharges from regulated MS4s must comply with all applicable requirements established in accordance with 25 Pa. Code Chapters 91-96, 102, and 105 of DEP's rules and regulations. DEP may, upon written notice, require additional BMPs or other control measures to ensure that the water quality standards of the surface waters receiving stormwater discharges are attained.

Part C

Part C of this permit was developed using a combination of language from the City's previous MS4 permit, the City's suggested language, the 2016 Pennsylvania MS4 Phase II permit (PG-13 & Individual Permit), other Phase I permits, and from comments from EPA inspection of the City's MS4.

Special Conditions

I. Legal Authority

The City shall maintain adequate legal authority in accordance with NPDES regulations, 40 Code of Federal Regulation (C.F.R.) 122.26(d)(1)(ii) and 122.26(d)(2)(i).

II. Stormwater Management Program (SWMP)

A. SWMP

From the previous permit the SWMP has been updated to address Public Education and Outreach, Public Participation/Involvement, Detection, Investigation, and Abatement of Illicit Connections and Improper Disposal, Monitor and Control Storm Water from Construction Activities, Post-Construction Stormwater Management, Pollution Prevention and Good Housekeeping for Municipal Operations, and Monitor and Control Pollutants from Industrial Sources. The City shall be able to address the Minimum Control Measures (MCM) as it is required per the MS4 PAG-13/IP, therefore the MCM's where addressed in this permit renewal using language that Phase II MS4s will be required to implement. Other language used for the SWMP include suggested language from the City, other Phase I permittees, and DEP specific language for the permittee.

1. Source Identification

As part of the SWMP the City will be required to update maps, GIS data layers, identification and mapping of storm sewer system, land use activities, percent impervious, population estimates, hydrologic factors used to estimate flow or pollutant loading, publicly owned lands, bioassessment areas, location of retention/detention basins, infiltration devices, etc., all city owned BMPs.

2. Discharge Management, Characterization, and Watershed-based Assessment and Management Program

The City will continue performing watershed-based assessment and planning in all the watersheds within the City boundaries and continue to complete Act 167 plans for those watersheds in accordance

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to the Storm Water Management Act. An inventory of all non-point and point source dischargers to the City's MS4 shall be developed and updated as necessary. If not already in place the City shall develop a Monitoring Plan and collect monitoring data to characterize the extent of physical, chemical, and biological impairments in the watersheds. The City shall continue to evaluate Quality Assurance/Quality Control of all data collected and evaluate stormwater technologies for the City's land-water-infrastructure approach to achieve its watershed management goals. The City shall work with other municipalities, counties, and other watershed stakeholders through watershed partnerships to continue watershed planning and implementations process. These requirements are a continuation of the previous permit requirements that will continue in this permit renewal.

3. Public Education and Outreach

The City shall implement a public education and participation program to reach the different audiences within the City and educate on stormwater management subjects. The City will have specific stormwater education and outreach program designed to reach the audience groups listed below:

- 1) General Public
- 2) Homeowners, landscapers, and property managers
- 3) Engineer, contractors, developers, review staff, and land use planners

(Language was used from NPDES Permit No. DC0000221 Government of the District of Columbia issued on October 7, 2011.)

Additional Language was added to comply with PAG-13 MCM # 1 BMP requirements.

4. Public Involvement/Participation

The City shall find alternative ways to educate the citizens of Philadelphia on stormwater management subjects through various outreach and public involvement activities. The City shall evaluate current Public Involvement/Participation program and examine its effectiveness in reaching the targeted audiences. The City shall provide a program to City employees and contractors, with controls of application of pesticides, herbicides, and fertilizers to City right of way, parks and other municipal property in accordance with Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)(40 CFR Parts 150-189). The City will evaluate its current trash and recyclable pick-up operations, litter control programs and public outreach efforts. (Permit No. MD0068284 for Prince George's County, Maryland) The City will evaluate current animal waste control program and public outreach, which includes the creation of an animal waste ordinance. Educational materials shall also be made available to the citizens of Philadelphia.

The City shall continue to address yard waste that makes its way into the City's MS4; promote, publicize, and facilitate the proper disposal of yard waste; facilitate the communication/reporting to the City of any illicit discharges and/or improper disposals that might be going on throughout the City. The City will continue its efforts of collecting and educating the community of the disposal of used oil and toxic materials, through continue collection events throughout the City at no less than 4 times per year.

The City will inform the DEP on the amount of stormwater inlets that have been Labeled and Stenciled throughout the City's permit term, and for the City to continue any Labeling/Stenciling of stormwater inlets not yet labeled/stenciled.

The language of this section includes language from other Phase I permits, the City suggested language, and PAG-13/IP MCM #2 BMPs are addressed in this section.

5. Detection, Investigation, and Abatement of Illicit Connections and Improper Disposal

The City shall develop, maintain, and submit a map of the City's MS4 with mapped outfalls and the locations and names of surface waters that receive discharges from those outfalls. The City shall also develop, maintain, and submit maps of the City's MS4 storm sewer collection system owned and

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operated by the City.

Sewer and Lateral inspections shall be done by the City, requiring strict compliance with the City's Plumbing, Sanitary & Storm Systems Codes, and requiring a permit for new connections. Where permits have been issued, inspectors shall verify proper connections to sanitary and storm sewers. The City shall investigate and prioritize outfalls according to the severity of the pollution discharged from outfalls in dry weather flows. Outfalls that have been determined to have dry weather flow, a visual inspection shall be done and further sampling shall be done if odors and/or visual inspection show additional pollutants. The City will continue to investigate evidence of sanitary sewage contamination in storm sewers and abate any cross connections. The City shall maintain an inventory of Sanitary Flow Diversion Valves (SFDVs) installed in certain sewer systems and develop a plan for their elimination. The sanitary flow diversion valve requirement was added to address the future status and the City's outlook of the SFDVs that were originally installed as a temporary solution rather than a permanent solution.

The City shall continue to operate cross-connection identification and repair program, through Notice of Defect and inspections. A pilot program shall be initiated by the City to research and demonstrate pilot components to optimize the City's existing cross connection identification and repair program. The City shall establish a program to require new property owners to undergo cross connection testing and require any repairs before the sale of the property is concluded. In each annual report the City shall compile and submit to the DEP an update of the illicit connection program. A summary of source investigation, source corrections, outfall sampling and inspections, and any other problems not associated with defective laterals that resulted in sewage discharge shall be submitted in the annual report.

An educational requirement was added to the City's permit to educate the citizens of Philadelphia on the importance of Illicit Discharge reporting. This section also includes examples the City can use to do such outreach.

The language used in this section was used previous permit, PAG-13/IP Phase II MS4 permit, and some additional language was generated to address City specific requirements.

6. Monitor and Control Storm Water from Construction Activities

The City is required to implement and enforce a program to control stormwater runoff from construction activities in a land disturbance greater than or equal to one acre, including projects less than one acre per 25 Pa Code § 102. As part of this program the permittee shall enact ordinances, require site erosion and sediment control BMPs, control construction waste on site, operator training, site plan reviews, consideration of public comments, and site inspection and enforcement. The City is required to implement and enforce a program to reduce pollution from stormwater runoff to the MS4 from new development and redevelopment. The City will act as Conservation District through the Philadelphia Water Department (PWD) to coordinate the review of Erosion and Sediment Control Plans and Post-construction Stormwater Management Plans with the DEP. DEP's inspections are available to the City in DEP's Records Management System (RMS) and on case-by-case the DEP will mail inspections to the permittee. DEP will initiate non-compliance actions with NPDES permit conditions. The City may request the DEP to issue a General or Individual NPDES permit to any specific site and/or facility. The City shall make available Philadelphia's Stormwater Management Guidance Manual to developers and/or other parties as needed. The City will continue to enforce the City's code on floodplain construction and the use of BMPs in new development and redevelopment.

This section is a combination of previous permit language and Phase II MS4 PAG-13/IP MCM 4 BMPs for permittees using and not using DEP's 102 program.

7. Post Construction Stormwater Management

This section language was updated to address Phase II MS4 PAG-13/IP requirements and previous permit language remained. The Post Construction Stormwater Management will address requirements

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to implement PCSM BMP's, encourage Low Impact Development, the MS4 shall require the installation of different types of controls, develop ordinances, long-term maintenance, and maintenance agreements of post construction stormwater management BMPs.

8. Pollution Prevention/Good Housekeeping for Municipal Operations

Pollution Prevention/Good Housekeeping for Municipal Operations was added to this permit renewal to make sure the City has good housekeeping of its own municipal operations. The City shall develop if not already in place an operation and maintenance plan (O&M Plan) for all municipal operations and facilities that could contribute pollution to the City's MS4. The City shall make sure it's municipal operations are not contributing pollution to the City's MS4 through education and O&M Plan for all City operations. As part of good housekeeping the City shall continue to assess the condition of the City's storm sewer infrastructure with a program that inspects, inventory, plans reinvestment and rehabilitation of the City's storm sewer. The language in this section is mainly from the Phase II MS4 PAG-13/IP permit requirements, with the exception of 8.a. that was added to address any high risk sites owned and operated by the City.

9. Monitor and Control Pollutants from Industrial Sources

The City shall implement a program to identify and control pollutants in stormwater discharges to the MS4 from industrial and high risk runoff facilities and any other industrial or commercial discharges the City determines are contributing a significant pollutant loading to the MS4. Language for industrial and high risk runoff is a continuation from the previous permit and it was updated using language from Permit No. VA0088579 for Arlington County, Virginia issued on June 26, 2013. This language is important for the city to address unpermitted and permitted industrial/commercial facilities under any NPDES permits or any city permits that might be discharging pollutants to the City's MS4.

Monitoring and Control Pollutants from Industrial Sources was added so that the City Transmittal letter on DEP actions on NPDES Individual and General permits within the City boundaries will be mailed to the address on the permit. The City shall conduct inspections of NPDES permit facilities and significant industrial/commercial users at a minimum of once per year. The City shall submit to the DEP a list of industrial dischargers and inspections performed throughout the year and will report any violations observed by industrial NPDES permittees, the DEP will initiate any enforcement action to those permittees. The City shall conduct enforcement to any violations to the City's stormwater ordinances and regulations.

10. Fiscal Analysis

Each fiscal year the City shall conduct a fiscal analysis for the necessary use of capital expenses for the implementation of each programs required in this permit.

III. MS4 TMDL PLAN

There are various Total Maximum Daily Loads (TMDLs) applicable to the City of Philadelphia. Table 1. Description of Receiving Waters from the City permit application show that some of the mentioned waterbodies have TMDL Parameters that need to be addressed by the City. The City has developed a Sediment Total Maximum Daily Load (TMDL) for Wissachickon Creek, and shall continue to address Total Maximum Daily Loads for Polychlorinated Biphenyls (PCBs) for Zones 2-5 of the Tidal Delaware River, and PCB Total Maximum Daily Load for the Schuylkill River; Schuylkill, Berks, Montgomery, Chester, and Philadelphia Counties, Pennsylvania. As part of these TMDLs, the City shall continue to address each TMDL:

a. MS4 TMDL Plan for Impaired Waters with a TMDL

For current and any future TMDL Plans, the City shall create/implement a MS4 TMDL Plan consistent with the conditions and assumptions of the applicable waste load allocation (WLA) in approved TMDLs, and it must include implementation of pollutant control measures that reduce pollutants in discharges from the regulated MS4 as required by the wasteload allocations in the

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TMDLs. (Pennsylvania MS4 Individual Permit) Additional TMDL parameters are found in Table 1. The City shall address any applicable TMDLs. Any new or current TMDL plans shall follow Appendix F and also follow the TMDL Plan Instructions found in DEP's Website.

Table 1. Description of Receiving Waters provided in Philadelphia's Phase I Permit Application.

Name of Waterbody	Designated Uses	Existing Uses	303(d) Listed? (Y/N)	TMDL Parameter (s)
Wissahickon Creek	TSF, MF for areas: Basin	Same as designated use	Y	Category: Point Source, Nonpoint Source, Cause: Nutrients, Cause Unknown, Siltation
Pennypack Creek	TSF, MF for areas: Basin, Source to US 13 Bridge; WWF, MF for areas: Non-Tidal Portions of Basin, US 13 Bridge to Mouth	Same as designated use	Y	Category: Point Source, Cause: Organic Enrichment/Low D.O., Pathogens, Priority Organics
Poquessing Creek	WWF, MF for areas: Non-Tidal Portions of Basin, Source To Mouth	Same as designated use	Y	Category: Fish Consumption Cause: PCB
Delaware River	WFF (Maintenance Only); MF (Passage Only); Delete WC; See DRBC regulations-Water Quality Zone 3 for areas: Tidal Portions of Basin, RM 108.4 to Big Timber Creek (NJ); WWF (Maintenance Only); MF (Passage Only); N Delete WC, PWS, LWS and IRS; See DRBC regulations-Water Quality Zone 4 for areas: Tidal Portions of Basin, Big timber Creek (NJ) to Philadelphia-Delaware County Border	Same as designated use	Y	Category: Fish Consumption Cause: PCB, Priority Organics
Schuylkill River	WWF, MF for areas: Main Stem, Little Schuylkill River to Head of Tide	Same as designated use	Y	Category: Fish Consumption Cause: PCB
Tacony Creek	WWF, MF for areas: Basin	Same as designated use	Y	Category: Fish Consumption Cause: PCB
Cobbs Creek	WWF, MF for areas: Non-Tidal Portions of Basin	Same as designated use	Y	Category: Nonpoint Source, Cause: Cause Unknown, Siltation

b. Applicable TMDLs for the City of Philadelphia MS4:

1. Siltation Total Maximum Daily Load (TMDL) for Wissahickon Creek

"The City shall continue to implement the *Wissahickon Siltation TMDL Implementation Plan for the City of Philadelphia* through the construction of identified stream bank restoration projects, storm water wetland projects, implementation of the Philadelphia Storm Water Management Regulations,

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and regular maintenance including sediment removal from Stormwater inlets.” (City of Philadelphia MS4 permit)

As part of the Siltation TMDL for the Wissahickon Creek, the City is required to revisit the TMDL Implementation Plan to assess the effectiveness of the implementation plan, moving forward will be important to make sure that the TMDL implementation plan is achieving its goals. The City is required to submit the most up to date implementation plan, evaluate constructed/implemented BMPs, and quantify concentrations of Polychlorinated Biphenyls (PCBs) in sediment removed.

2. Total Maximum Daily Loads for Polychlorinated Biphenyls (PCBs) for Zones 2-5 of the Tidal Delaware River & PCB Total Maximum Daily Load for The Schuylkill River: Schuylkill, Berks, Montgomery, Chester and Philadelphia Counties, Pennsylvania

As part of this TMDL requirement the City is required to address PCBs in the Delaware and Schuylkill Rivers. As it was required in the previous permit, the permittee shall develop a Pollutant Minimization Plan (PMP) to satisfy the Delaware Estuary and Schuylkill River PCB TMDLs. Table 2. Total PCB Sample Results, submitted in FY 2009 Annual Report, shows that there is an increase of PCBs from dry to wet weather sampling. PCB TMDL language was developed by the City after a joint meeting with the Delaware River Basin Commission (DRBC) on January 20, 2016. In this meeting both the DRBC and the City both presented, DRBC presented the findings from the data found on Table 2. Below and the City presented what is currently doing as part of their efforts for their PCB TMDL. The City developed language proposing to concentrate its efforts on specific watersheds where PCB Wet Weather data is higher than in other areas.

Table 2. Total PCB Sample Results

Field ID	Sample Date	Dry/Wet	Total PCBs (pg/l)	
			U=0	U=EDL/2
COBB 355	April 28, 2009	Dry	1,604	1,617
COBB 355	May 7, 2009	Wet	8,884	8,892
WISS 135	April 28, 2009	Dry	1,067	1,084
WISS 135	May 7, 2009	Wet	12,676	12,693
SCHU 154	April 28, 2009	Dry	1,400	1,419
SCHU 154	May 7, 2009	Wet	10,768	10,775
POQU 150	April 28, 2009	Dry	743	756
POQU 150	May 7, 2009	Wet	4,605	4,615
PENN 175	April 28, 2009	Dry	935	950
PENN 175	May 7, 2009	Wet	36,352	36,364
TACO 250	April 28, 2009	Dry	2,739	2,750
TACO 250	May 7, 2009	Wet	3,861	3,870

IV. POLLUTANT CONTROL MEASURES AND POLLUTANT REDUCTION PLANS

Pollutant Control Measures (PCM) and Pollutant Reductions Plans (PRP) are requirements added per the new Phase II MS4 PAG-13/Individual permits. This is now state wide requirements for all MS4s with the intent of restoring the waters of the Commonwealth of Pennsylvania from Impaired to Un-Impaired. The City will have to complete Appendices B, C, and E for the below mentioned streams following the completion dates stated on the permit for each appendix.

Impaired Downstream Water or Applicable TMDL Name	Requirement(s)	Other Cause(s) of Impairment
East Branch Indian Creek	Appendix C – PCB (5) Appendix E – Siltation (5)	Cause Unknown (5) Other Habitat Alterations Water/Flow Variability (4c)

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Poquessing Creek	Appendix C – PCB (5) Appendix E – Excessive Algal Growth (5)	Flow Alterations Other Habitat Alterations Water/Flow Variability (4c)
Pennypack Creek	Appendix B – Pathogens (4a) Appendix C – Priority Organics (4a) Appendix E – Organic Enrichment/Low D.O. (4a) Appendix E – Siltation (5)	Cause Unknown (5)
Tacony Creek	Appendix E – Organic Enrichment/Low D.O. (5)	Flow Alterations Other Habitat Alterations Water/Flow Variability (4c)
Cobbs Creek	Appendix B – Pathogens (5) Appendix C – PCB (5) Appendix E – Siltation (5)	Cause Unknown (5) Other Habitat Alterations Water/Flow Variability (4c)
Delaware River	Appendix C – PCB (4a)	
Byberry Creek	Appendix E – Excessive Algal Growth (5)	Flow Alterations Other Habitat Alterations Water/Flow Variability (4c)
Wissahickon Creek	Appendix E – Nutrients (4a) Appendix B – Pathogens (5)	Water/Flow Variability (4c)
Mill Run		Flow Alterations Other Habitat Alterations Water/Flow Variability (4c)
Black Lake Run	Appendix E – Siltation (5)	Cause Unknown (5)
Unnamed Tributaries to Wissahickon Creek	Appendix E – Organic Enrichment/Low D.O. (5)	Other Habitat Alterations (4c)
Unnamed Tributaries to Schuylkill River	Appendix E – Siltation (5)	Water/Flow Variability (4c)
Schuylkill River	Appendix C – PCB (4a)	
Walton Run	Appendix E – Siltation (5)	Cause Unknown (5)
Wooden Bridge Run	Appendix E – Siltation (5)	Cause Unknown (5)
Indian Creek	Appendix C – PCB (5) Appendix E – Siltation (5)	Cause Unknown (5) Other Habitat Alterations Water/Flow Variability (4c)
Frankford Creek	Appendix C – PCB (4a) Appendix E – Organic Enrichment/Low D.O. (5)	Flow Alterations Other Habitat Alterations Water/Flow Variability (4c)
Darby Creek	Appendix C – PCB (5)	
Cresheim Creek		Water/Flow Variability (4c)
West Branch Indian Creek	Appendix C – PCB (5) Appendix E – Siltation (5)	Cause Unknown (5) Other Habitat Alterations Water/Flow Variability (4c)
Sandy Run		Cause Unknown (5) Flow Alterations Other Habitat Alterations Water/Flow Variability (4c)

V. OTHER REQUIREMENTS

- A. Proper Solid Disposal
- B. Monitoring of Stormwater Discharges
- C. SWMP to Prevent Increased Loading
- D. Develop and Maintain Adequate Legal Authority
- E. Other Entities to Satisfy NPDES Permit Obligation
- F. Best Management Practices

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The City will continue to maintain Mingo Creek Surge Basin. The City shall keep a Snow Management Plan if no plan is already in place. De-icing activities shall be reduce the amount of salt use and cover all salt piles from precipitation. If not already in place the City shall develop a street cleaning program which shall be described in the SWMP and included in the annual status report. This plan shall include research, modeling, and scientific literature for pollutant removal. This plan shall also describe the proper disposal of street sweeping debris.

The City shall develop an inlet maintenance program. Inlet maintenance report will be provided to the DEP with information of the stormwater inlet conditions in the City. The City will report the total amount of stormwater inlets within City boundary; Inlet Maintenance Schedule: inlets inspection goal per permit year, number of inlets inspected, inlets in need of maintenance, and inlets repairs and additional maintenance to any inlets; and evaluation of the efficiency of the Inlet Maintenance Program. This section was expanded from previous permit, to allow the City to quantify and create a program that will allow for maintenance and repair of inlets in the City.

The City shall implement a Litter Control Program as part of the SWMP. This program will consist of sampling and data collection to develop a Litter Control Program that will minimize in-stream trash at various streams in the City. The City shall investigate and develop a solution to plastic litter pollution, in specific pollution from excessive plastic shopping bags and mylar snack bags making their way to streams.

The City will have procedures to respond to sanitary infiltration by incident location, date identified, date corrected, and method of discharge. The City shall implement a Spill Prevention and Response plan that shall include spill response actions by the City and legal requirements for private entities within the City's jurisdiction. The City shall continue to remove debris from waterways, through the funding of a multi-crew force.

The City will continue to assess all BMPs within City watersheds and shall continue to assess hydrological and chemical loadings within the City watersheds.

The Draft permit was submitted to PWD, DRBC, and EPA for review.

The permittee will be required to post a public notice in accordance with DEP regulations at 25 Pa. Code § 92a.82(b), the permittee is compelled to post near the entrance to their premises and, if the facility or discharge location is remote from these premises, at the entrance to the facility or at the discharge location. These postings shall remain for 30 days.

DEP will publish notice of the draft permit in the Pennsylvania Bulletin in the near future. Anyone may provide written comments on the draft permit up to 30 days following publication of the notice. Following the 30-day public comment period comment period (which may be extended by 15 days at DEP's discretion), DEP will consider any comments received and make a decision on whether to issue a final permit. Comments should be sent to:

PA Department of Environmental Protection
Southeast Regional Office
Clean Water Program
2 East Main Street
Norristown, PA 19401

Proposed Part C Conditions:

Special Conditions

- I. Legal Authority
- II. Stormwater Management Program
 - B.
 - 1. Source Identification
 - 2. Discharge Management, Characterization, and Watershed-based Assessment and Management Program
 - 3. Public Education and Outreach

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4. Public Involvement/Participation
 5. Detection, Investigation, and Abatement of Illicit Connections and Improper Disposal
 6. Monitor and Control Storm Water from Construction Activities
 7. Post Construction Stormwater Management
 8. Pollution Prevention/Good Housekeeping for Municipal Operations
 9. Monitor and Control Pollutants from Industrial Sources
 10. Fiscal Analysis
- III. MS4 TMDL PLAN
- IV. POLLUTANT CONTROL MEASURES AND POLLUTANT REDUCTION PLANS
- V. OTHER REQUIREMENTS
- A. Proper Solid Disposal
 - B. Monitoring of Stormwater Discharges
 - C. SWMP to Prevent Increased Loading
 - D. Develop and Maintain Adequate Legal Authority
 - E. Other Entities to Satisfy NPDES Permit Obligation
 - F. Best Management Practices
 1. Public Source Controls
 2. Maintain and Operate Roadways
 3. Spill Prevention and Response
 4. Waterway Debris Removal
 5. Pesticides, Herbicides, and Fertilizer Controls
 6. Assessment of Controls